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Pro Bono Attorneys for Plaintiffs,
Esvin Fernando Arredondo Rodriguez and A.F.A.J.

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

ESVIN FERNANDO ARREDONDO
RODRIGUEZ INDIVIDUALLY AND
A.F.A.J., A MINOR, BY HER GUARDIAN
AD LITEM, JEFFREY HAMILTON,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No.: CV 22-02845-JLS-JC

**PLAINTIFFS' NOTICE OF
MOTION TO EXCLUDE
TESTIMONY AND REPORTS OF
PROPOSED EXPERT JUNE
HAGEN [*DAUBERT*]**

Hearing Date: March 29, 2024

Hearing Time: 10:30 a.m.

Judge: Honorable Josephine L. Staton

Place: Courtroom 8A

1 PLEASE TAKE NOTICE THAT at 10: 30 a.m. on March 29 2024, or as soon
2 thereafter as the matter may be heard in the above-entitled Court located at First
3 Street U.S. Courthouse, 350 West 1st Street, Los Angeles, CA 90012, Courtroom
4 8A, 8th floor, Plaintiffs Esvin Fernando Arredondo Rodriguez (“Fernando”) and
5 A.F.A.J., by her Guardian Ad Litem, Jeffrey Hamilton, (collectively, “Plaintiffs”)
6 will and hereby does move the Court to strike portions of defendant United States of
7 America’s (“Defendant” or the “Government”) expert reports.

8 Plaintiffs base their motion on this Notice of Motion and Motion, the
9 Declaration of Linda Dakin-Grimm in support of this motion and exhibits, the
10 pleadings, records and files in this case, and such other matters as may be considered
11 by the Court.

12 This motion is made pursuant to the Court’s Rule 26(f) Scheduling Order,
13 ECF No. 51.

1 Dated: February 23, 2024

Respectfully Submitted,

MILBANK LLP

3 By: /s/ Linda Dakin-Grimm

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